

Case 4:23-cr-00122 *SEALED* Document 1 Filed on 03/22/23 in TXSD Page 2 of 3

and possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance and (2) said conduct occurs in or affects interstate and foreign commerce, knowing and intending to provide, directly and indirectly, anything of pecuniary value to any persons and organization, that has engaged and engages in terrorist activity and terrorism, namely, the Ejercito de Liberacion Nacional, also known as ELN; all in violation of Title 21, United States Code, Sections 960a, 841(a)(1), 841(b)(1)(A)(ii) and Title 18, United States Code, Section 2.

COUNT TWO
(International Cocaine Distribution Conspiracy)

Beginning in January 2007, the exact date being unknown to the Grand Jury, and continuing thereafter until the return of this Indictment, in the country of Colombia and within the extraterritorial jurisdiction of the United States, the defendants



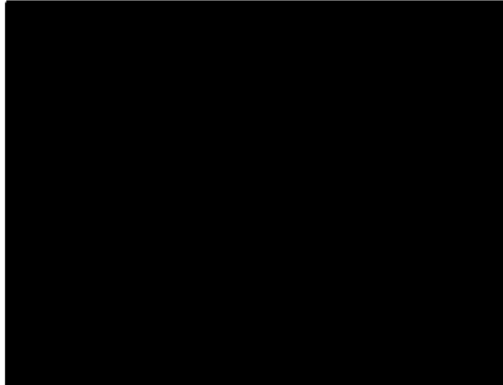
ADRIAN ALBERTO CANO GOMEZ
also known as Andrea

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jury to manufacture and distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending, knowing, or having reasonable cause to believe that such substance would be unlawfully imported into the United States.

In violation of Title 21, United States Code, §§ 963, 959(a), 960(a)(3) and 960 (b)(1)(B).

COUNT THREE
(International Cocaine Distribution)

From on or about October 1, 2021, and continuing through on or about November 12, 2021, in the country of Colombia and within the extraterritorial jurisdiction of the United States, defendants



ADRIAN ALBERTO CANO GOMEZ
also known as Andrea

did knowingly and intentionally manufacture and distribute a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States. The controlled substance involved was more than 5 kilograms, that is, approximately 15 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, §§ 959(a), 960(a)(3), 960(b)(1)(B), and Title 18, United States Code, § 2.

A TRUE BILL

Original Signature on File

FOREPERSON

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